

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

Charles Collins, et al., individually and on behalf
of a class of all others similarly situated,

Plaintiffs,

v.

City of Milwaukee, et al.,

Defendants.

Case No. 17-CV-00234-JPS

**PLAINTIFFS' MOTION TO
FILE EXHIBITS UNDER
SEAL PURSUANT TO
GENERAL L. R. 79(d)**

Plaintiffs, by and through counsel, hereby move this Court, pursuant to General Local Rule 79(d), to seal Exhibits D, E, F, G, and H, attached to the Declaration of Shanya Dingle in support of Plaintiffs' Response to Defendants' Motion for Entry of a Protective Order Pursuant to Local Rule 7(h) and Federal Rule of Civil Procedure 26(c) (Dkt. 51).

All five exhibits are internal documents of the Milwaukee Police Department ("MPD"), containing detailed information about criminal activity in Milwaukee, including thefts, burglaries, assaults, and sex crimes. These accounts include descriptions of the alleged crimes, as well as the names, social security numbers, addresses, and dates of birth of suspects, victims, juveniles, and witnesses. The individuals identified in these documents have no involvement in the instant case. Public release of their personally-identifying information and highly sensitive facts surrounding criminal activity could be extremely damaging to them. In recognition of these concerns, Defendants have designated four of the five documents (Exhibits D, E, F, and G) as "Confidential" under the Court's Protective Order (Dkt. 22). There is good cause to seal the exhibits because the individuals' privacy interests significantly outweigh the public interest in

these documents, and the personally-identifying information included therein has no bearing on the merits of the instant case. *See Cole v. Janssen Pharmaceuticals, Inc.*, Case No. 15-CV-57, 2017 WL 2929523, at *3 (E.D. Wis. Jul. 10, 2017) (granting motion to seal plaintiff's personally identifiable and sensitive medical information that was largely immaterial to the facts of the case); *Citizens First Nat. Bank of Princeton v. Cincinnati Ins. Co.*, 178 F.3d 943, 945 (7th Cir. 1999) (requiring "good cause" for sealing of court records).

In accordance with General Local Rule 79(d), Plaintiffs respectfully request that these materials be filed under seal. Defendants have provided their consent to Plaintiffs' motion, and a certification pursuant to General Local Rule 79(d)(4) is attached.

Dated this 27th day of September, 2017.

Respectfully submitted,

/s/ Shanya Dingle
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CERTIFICATION
PURSUANT TO GENERAL L. R. 79(d)(4)

Pursuant to General Local Rule 79(d)(4), on September 26, 2017, counsel for Plaintiffs and Defendants conferred in a good-faith attempt to limit the scope of the materials subject to sealing.

Dated: September 27, 2017

Respectfully submitted,

s/ Shanya Dingle
Shanya Dingle